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Attorney for Defendants Plumbers Local 690 Supplemental Retirement Plan, Thomas J. McNulty,
John I. Kane, Thomas J. Crowther, Timothy J. Brink, Howard Weinstein, John J. Bee.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY – CAMDEN VICINAGE**

JENNIFER A. GALLAGHER,	:	CIVIL ACTION
Plaintiff	:	
v.	:	No. 13-CV-1103
	:	Removed from NJ Superior Court
JOHN M. MAKOWSKI, et al.,	:	
Defendants	:	NOTICE OF MOTION FOR SUMMARY JUDGMENT UNDER FED.R.CIV.P. 56

TO: Joseph Pinto, Esq. Attorney for Plaintiff Gallagher

John M. Makowski, Esq. Attorney for Defendant Makowski

PLEASE TAKE NOTICE that on December 16, 2013, at 9:00 a.m. or as soon as thereafter as counsel may be heard, the undersigned attorney for the Defendants Plumbers Local 690 Supplemental Retirement Plan, Thomas J. McNulty, John I. Kane, Thomas J. Crowther, Timothy J. Brink, Howard Weinstein, and John J. Bee (the “Fund Defendants”) shall move before the Hon. Joseph E. Irenas, U.S.D.J., at the Mitchell H. Cohen Building and U.S. Courthouse, Courtroom 5A, 4th and Cooper Streets, Camden, New Jersey, 08101, for an Order granting summary judgment in favor of the Fund Defendants.

PLEASE TAKE FURTHER NOTICE that in support of said Motion, the Fund Defendants will rely upon the Certification of Thomas J. McNulty with Appendix of Exhibits and Brief in Support of Motion submitted herewith.

PLEASE TAKE FURTHER NOTICE that this Motion is being submitted on the papers and oral argument is waived.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is being submitted herewith.

Respectfully submitted,

/s/Liam Y. Braber

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